## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

	)
IN RE:	)
SUSAN JEANETTE PALMA	) Case No. 16-10471-BFK
DONALD CRAIG PALMA	) Chapter 7
Debtors	)
	)

## TRUSTEE'S MOTION FOR EXAMINATION OF LUCY K. PALMA PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004

Janet M. Meiburger, the Trustee for the estate of the Debtors in the above named case, by and through her undersigned counsel, pursuant to Federal Rules of Bankruptcy Procedure 2004 and Local Bankruptcy Rule 2004-1, hereby requests that the Court enter an order authorizing the Trustee to compel Lucy K. Palma to produce documents and to submit to an examination, if necessary, as described herein. In support of this Motion, the Trustee states as follows:

- 1. On February 11, 2016 (the "Petition Date"), the Debtors filed their voluntary petition for relief under Chapter 7 of the Bankruptcy Code. The Trustee was appointed on February 12, 2016 (Docket No. 3).
- 2. The Trustee believes that there is equity in the property located at 302 Inglewood Drive, Rochester, New York 14619 (the "Property"). The Property is owned by Mr. Palma (the "Debtor") and his ex-wife, Lucy K. Palma. Mrs. Palma lives in the Property.

Janet M. Meiburger, VA Bar No. 31842 The Meiburger Law Firm, P.C. 1493 Chain Bridge Road, Suite 201 McLean, VA 22101 (703) 556-7871 Counsel for Chapter 7 Trustee Case 16-10471-BFK Doc 44 Filed 01/11/17 Entered 01/11/17 16:15:23 Desc Main Document Page 2 of 3

3. The Trustee seeks to obtain a recent statement for the mortgage on the Property showing the amount owed under the mortgage.

4. The Trustee also seeks to obtain proof of insurance for the Property, if any.

WHEREFORE, Janet M. Meiburger, the Chapter 7 Trustee, by counsel, respectfully requests that the Court enter an Order authorizing the Trustee to obtain documents from Lucy K. Palma, pursuant to subpoena, and to examine Lucy K. Palma under oath, if necessary, in order to obtain the documents and information as described herein, pursuant to Federal Rule of Bankruptcy Procedure 2004, and granting such further relief as the Court deems appropriate under the circumstances.

Respectfully submitted, THE MEIBURGER LAW FIRM, P.C.

Dated: January 11, 2017 By: /s/ Janet M. Meiburger

Janet M. Meiburger, Esq., VSB No. 31842 The Meiburger Law Firm, P.C. 1493 Chain Bridge Road, Suite 201 McLean, Virginia 22101 (703) 556-7871 Counsel to the Chapter 7 Trustee Case 16-10471-BFK Doc 44 Filed 01/11/17 Entered 01/11/17 16:15:23 Desc Main Document Page 3 of 3

## **CERTIFICATE OF SERVICE**

I HEREBY certify that on this 11th day of January, 2017, a true and correct copy of the foregoing Trustee's Motion for Examination of Lucy K. Palma Pursuant to Federal Rule of Bankruptcy Procedure 2004 will be served by ECF e-mail pursuant to the applicable Standing Order of the Court, and by first class mail, postage prepaid on the following:

Lucy K. Palma 302 Inglewood Drive Rochester, New York 14619

/s/ Janet M. Meiburger
Janet M. Meiburger